



October 12, 2021

Document Electronically Filed

Hon. Barbara C. Moses
United States Magistrate Judge
U.S. District Court for the Southern District of New York
United States Courthouse, Courtroom 20A
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

Re: Walker o/b/o P.L.C. v. Commissioner of Social Security
Civil Action No: 1:20-cv-10374-BCM

Dear Judge Moses:

This letter respectfully requests an extension of time of sixty (60) days for Plaintiff to file her motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgement on the Pleadings is currently due on October 18, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her Motion. Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgement on the Pleadings will be due on **December 17, 2021**. Subsequently, in accordance with the pattern of the Standing Order at Dkt. No. 5, the Commissioner's response to the Motion for Judgement on the Pleadings would then be due on or before **February 15, 2022**. Plaintiff's reply, if any, will be due on or before ~~**February 29, 2022**~~. **March 8, 2022**.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.

Bar Code H06529

Counsel for Plaintiff

CC [via ECF]: Leslie A. Ramirez-Fisher, Esq. (Counsel for Defendant)

SO ORDERED.

Dated: October 14, 2021
New York, NY

Honorable Barbara C. Moses
U.S. Magistrate Judge